Section 1. Registration Information

Source Identification

Facility Name:	Falcon Safety Products, Inc
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	5-year update (40 CFR 68.190(b)(1))
Description:	
Receipt Date:	19-Oct-2019
Postmark Date:	19-Oct-2019
Next Due Date:	19-Oct-2024
Completeness Check Date:	19-Oct-2019
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0008 0869
Other EPA Systems Facility ID:	
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	25 ImClone Drive
Street 2:	PO Box 1299
City:	Somerville
State:	NEW JERSEY
ZIP:	08876
ZIP4:	1299
County:	SOMERSET

Facility Latitude and Longitude

Latitude (decimal):	40.556028
Longitude (decimal):	-074.707000
Lat/Long Method:	Address Matching - Digitized
Lat/Long Description:	Administrative Building
Horizontal Accuracy Measure:	1
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	

Owner or Operator

Operator Name:	Philip Lapin
Operator Phone:	(908) 707-4900

Mailing Address

Operator Street 1:	25 ImClone Drive
Operator Street 2:	PO Box 1299
Operator City:	Somerville
Operator State:	NEW JERSEY
Operator ZIP:	08876
Operator ZIP4:	1299
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Diane (Issendorf) Chrinko
RMP Title of Person or Position:	Quality & Safety Manager
RMP E-mail Address:	dchrinko@falconsafety.com

Emergency Contact

Emergency Contact Name:	Greg Mas
Emergency Contact Title:	EVP Finance & Operations
Emergency Contact Phone:	(908) 707-4900
Emergency Contact 24-Hour Phone:	(908) 268-2390
Emergency Contact Ext. or PIN:	240
Emergency Contact E-mail Address:	gmas@falconsafety.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Somerset County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	40
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	07-Mar-2019
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:	Yes

Preparer Information

Preparer Name:
Preparer Phone:
Preparer Street 1:
Preparer Street 2:
Preparer City:
Preparer State:
Preparer ZIP:
Preparer ZIP4:
Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:	See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000103890
Description:	Tank Farm
Process Chemical ID:	1000130053
Program Level:	Program Level 3 process
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
CAS Number:	75-37-6
Quantity (lbs):	198000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000103891
Description:	Warehouse
Process Chemical ID:	1000130054
Program Level:	Program Level 3 process
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
CAS Number:	75-37-6
Quantity (lbs):	450000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000103890
Process NAICS ID:	1000105223
Program Level:	Program Level 3 process
NAICS Code:	325998
NAICS Description:	All Other Miscellaneous Chemical Product and Preparation Manufacturing

Process ID:	1000103891
Process NAICS ID:	1000105224
Program Level:	Program Level 3 process
NAICS Code:	325998
NAICS Description:	All Other Miscellaneous Chemical Product and Preparation Manufacturing

Section 2. Toxics: Worst Case

No records found.

Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000062181

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000058357

Model Used:	EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:	
Fire Walls:	
Blast Walls:	
Enclosures:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	Yes
Water Curtain:	
Excess Flow Valve:	Yes
Other Type:	

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000109438
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
Flammable/Toxic:	Flammable
CAS Number:	75-37-6

Process ID:	1000103890
Description:	Tank Farm
Prevention Program Level 3 ID:	1000087834
NAICS Code:	325998

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	02-May-2019

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	19-Nov-2015

The Technique Used

What If:	
Checklist:	
What If/Checklist:	
HAZOP:	Yes
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Dec-2015

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	
Loss of Cooling, Heating, Electricity, Instrument Air:	

Earthquake:	
Floods (Flood Plain):	
Tornado:	Yes
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	Yes
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	Yes
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	Yes
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	Yes
Change Process Parameters:	

Installation of Process Controls:	Yes
Installation of Process Detection Systems:	Yes
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	Yes
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	29-Nov-2018

Training

Training Revision Date (The date of the most recent review or revision of training programs):	29-Nov-2018

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	
Oral Tests:	Yes
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	29-Nov-2018
Equipment Inspection Date (The date of the most recent equipment inspection or test):	18-Sep-2019
Equipment Tested (Equipment most recently inspected or tested):	gas detection devices

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	11-Jul-2019
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	09-Jul-2019

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	11-Jul-2019

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	30-Nov-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Dec-2018

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	20-Apr-2017
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	20-Apr-2017

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	26-Nov-2018

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	26-Nov-2018

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	10-Dec-2018
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	15-Jul-2019

Confidential Business Information

CBI Claimed:

Description

No description available.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000109439
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
Flammable/Toxic:	Flammable
CAS Number:	75-37-6

Process ID:	1000103891
Description:	Warehouse
Prevention Program Level 3 ID:	1000087835
NAICS Code:	325998

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	29-Nov-2018

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	19-Nov-2015

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Dec-2015

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	
Corrosion:	
Overfilling:	
Contamination:	
Equipment Failure:	
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	

Floods (Flood Plain):
Tornado:
Hurricanes:
Other Major Hazard Identified:

Process Controls in Use

Vents:
Relief Valves:
Check Valves:
Scrubbers:
Flares:
Manual Shutoffs:
Automatic Shutoffs:
Interlocks:
Alarms and Procedures:
Keyed Bypass:
Emergency Air Supply:
Emergency Power:
Backup Pump:
Grounding Equipment:
Inhibitor Addition:
Rupture Disks:
Excess Flow Device:
Quench System:
Purge System:
None: Yes
Other Process Control in Use:

Mitigation Systems in Use

Sprinkler System: Yes
Dikes:
Fire Walls:
Blast Walls:
Deluge System:
Water Curtain:
Enclosure:
Neutralization:
None:
Other Mitigation System in Use:

Monitoring/Detection Systems in Use

Process Area Detectors:
Perimeter Monitors:
None: Yes
Other Monitoring/Detection System in Use:

Changes Since Last PHA Update

Reduction in Chemical Inventory:
Increase in Chemical Inventory:
Change Process Parameters:
Installation of Process Controls:

Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	Yes
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	29-Nov-2018

Training

Training Revision Date (The date of the most recent review or revision of training programs):	29-Nov-2018

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	29-Nov-2018
Equipment Inspection Date (The date of the most recent equipment inspection or test):	15-Oct-2019
Equipment Tested (Equipment most recently inspected or tested):	Fork Lift

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	09-Jul-2019

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	30-Nov-2018
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Dec-2018

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	26-Nov-2018

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	26-Nov-2018

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	10-Dec-2018
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	15-Jul-2019

Confidential Business Information

CBI Claimed:	

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	08-Jul-2019

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	07-Nov-2018

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Neshanic Fire Department
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(908) 369-4800

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	Yes
RCRA Regulations at CFR 264, 265, and 279.52:	Yes
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	Yes
State EPCRA Rules or Laws:	Yes
Other (Specify):	

Executive Summary

General Executive Summary for Manufacturing Facilities

1. Accidental Release Prevention and Emergency Response Policies

We at Falcon Safety Products are strongly committed to employee, public and environmental safety. This commitment is demonstrated by our comprehensive accidental release prevention program that covers areas such as design, installation, operating procedures, maintenance, and employee training associated with the processes at our facility. It is our policy to implement appropriate controls to prevent possible releases of regulated substances.

2. The Stationary Source and the Regulated Substances Handled

Our facility's primary activities encompass the manufacture of a variety of aerosol products. We have 2 regulated substances at our facility. The first is Difluoroethane (Ethane, 1,1-difluoro-) which is used in our aerosol filling process as a propellant for the manufacture of compressed gas dusters and horns. The other is Isobutane which is used on our filling process as a propellant for the manufacture of compressed gas horns.

3. The General Accidental Release Prevention Program and the Chemical-Specific Prevention Steps
Our facility has taken all the necessary steps to comply with the accidental release prevention requirements set out under 40 CFR part 68 of the EPA. This facility was designed and constructed in accordance with NFPA-58, NFPA 30B, NFPA 13 standards.
The following sections briefly describe the elements of the release prevention program that is in place at our stationary source.

Process Safety Information
Falcon Safety Products maintains a detailed record of safety information that describes the chemical hazards, operating parameters and equipment designs associated with all processes.

Process Hazard Analysis
Our facility conducts comprehensive studies to ensure that hazards associated with our processes are identified and controlled efficiently. The methodology used to carry out these analyses is HAZOP, What-if, and checklists. The studies are undertaken by a team of qualified personnel with expertise in engineering and process operations and are revalidated at a regular interval of 5 years. Any findings related to the hazard analysis are addressed in a timely manner. The most recent PHA/update was performed on 11/19/15

Operating Procedures
For the purposes of safely conducting activities within our covered processes, Falcon Safety Products maintains written operating procedures. These procedures address various modes of operation such as initial startup, normal operations, temporary operations, emergency shutdown, emergency operations, normal shutdown and startup after a turnaround. The information is regularly reviewed and is readily accessible to operators involved in the processes.

Training
Falcon Safety Products has a comprehensive training program in place to ensure that employees who are operating processes are competent in the operating procedures associated with these processes. Refresher training is provided at least every three years and more frequently as needed.

Mechanical Integrity
Falcon Safety Products carries out highly documented maintenance checks on process equipment to ensure proper operations. Process equipment examined by these checks includes among others; pressure vessels, storage tanks, piping systems, relief and vent systems, emergency shutdown systems, controls and pumps. Maintenance operations are carried out by qualified personnel with previous training in maintenance practices. Furthermore, these personnel are offered specialized training as needed. Any equipment deficiencies identified by the maintenance checks are corrected in a safe and timely manner.

Management of Change
Written procedures are in place at Falcon Safety Products to manage changes in process chemicals, technology, equipment and

procedures. The most recent review/revision of the procedure was performed on 07/09/2019. The most recent Management of Change request was in July 11, 2019. Process operators, maintenance personnel or any other employee whose job tasks are affected by a modification in process conditions are promptly made aware of and offered training to deal with the modification.

Pre-startup Reviews
Pre-start up safety reviews related to new processes and to modifications in established processes are conducted as a regular practice at Falcon Safety Products . The most recent review was performed on 07/11/2019. These reviews are conducted to confirm that construction, equipment, operating and maintenance procedures are suitable for safe startup prior to placing equipment into operation.

Compliance Audits
Falcon Safety Products conducts audits on a regular basis to determine whether the provisions set out under the RMP rule are being implemented. The most recent compliance audit was conducted on 11/30/2018. These audits are carried out at least anually and any corrective actions required as a result of the audits are undertaken in a safe and prompt manner.

Incident Investigation
Falcon Safety Products promptly investigates any incident that has resulted in, or could reasonably result in a catastrophic release of a regulated substance. These investigations are undertaken to identify the situation leading to the incident as well as any corrective actions to prevent the release from reoccurring. All reports are retained for a minimum of 5 years.

Employee Participation
Falcon Safety Products truly believes that process safety management and accident prevention is a team effort. Company employees are strongly encouraged to express their views concerning accident prevention issues and to recommend improvements. In addition, our employees have access to all information created as part of the facility's implementation of the RMP rule, including information resulting from process hazard analyses in particular.

Contractors
On occasion, our company hires contractors to conduct specialized maintenance and construction activities. Prior to selecting a contractor, a thorough evaluation of safety performance of the contractor is carried out. Falcon Safety Products has a strict policy of informing the contractors of known potential hazards related the contractor's work and the processes. Contractors are also informed of all the procedures for emergency response should an accidental release of a regulated substance occur.

4. Five-year Accident History

Falcon Safety Products has had an excellent record of preventing accidental releases over the last 5 years. Due to our stringent release prevention policies, there has been no accidental release during this period.

5. Emergency Response Plan

Falcon Safety Products carries a written emergency response plan to deal with accidental releases of hazardous materials. The plan includes all aspects of emergency response including adequate first aid and medical treatment, evacuations, notification of local emergency response agencies and the public, as well as post-incident decontamination of affected areas.

To ensure proper functioning, our emergency response equipment is regularly inspected and serviced. In addition, the plan is promptly updated to reflect any pertinent changes taking place within our processes that would require a modified emergency response.

Somerset County LEPC is the Local Emergency Planning Committee (LEPC) with which our emergency plan has been coordinated and verified.

6. Planned Changes to Improve Safety
Several developments and findings have resulted from the implementation of the various elements of our accidental release prevention program. Employee suggestions, process re-engineering, vendor equipment upgrades, and hazard analysis are some

of the techniques we take to improve safety at our facility. These changes are continuous and ongoing. Training of operators, safety inspections, process hazard analysis, emergency shutdown systems, and maintenance of equipment are some of the major steps we have taken to improve safety at our facility. Additional emergency shutdown stations have been added to expedite shutdown of the system in the event of emergency. Continual modification of existing product equipment such as heat tunnel elevation, protective cages, additional guards, etc. have been implemented to reduce the possibility of injury. Additional e-stops have also been added outside the aerosol fillers to allow exterior shutdown. Using desktop scenarios, we continue to find the opportunity for improvements within the facility.

A camera surveillance system has also been added to the facility to provide additional security and safety of the employees and facility. Security and first aid drills will also be added to the evacuation plan.

With the addition of a 10,000 gallon tank we have implemented a modification to the existing deluge system to include coverage for the new tank and have upgraded all piping and sprinkler heads. Existing facility sprinkler system has also been upgraded according to NFPA recommendations which protects all interior sections of the building. Local authorities were involved in the process and ensured water flow will suffice in the event of an emergency. Local fire officials were present during the installation and testing of the new deluge system every step of the way.

An additional higher technology filling line has also been added. During the design phase many additional safety features were added to the filling line. A central control panel automatically controls the mechanical functions of the filling line from feeding of the cans to the actuator placer. Sensor and auto shut off features have been implemented throughout the line and thorough training has occurred throughout the process.

Along with the new filling line an additional Gunderson gas house was installed in our facility to accommodate the new equipment. The gas house is equipped with Fenwal protection devices, gas detection, two stage ventilation, blow out panels/door and an automated control panel to control all aspects of the gas house. The control panel and emergency lighting/alarms warn all operators of any issues within the gas house to prevent entrance in the event a release is detected. The control panel also automates shutdown of the filling process and pumps should a gas release occur.